

May 5, 2010

Attn: Christopher Morse, Reports Analyst
Reports Analysis Division
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00300921

Reference: Year End Report (7/1/09 - 12/31/09)

This memorandum is in response to your letter dated April 2, 2010 that was submitted due to concerns prompted by your review of our Year End Report (7/1/09 - 12/31/09):

'Best Efforts'

In response to your concerns regarding our 'best efforts' to obtain the full name, mailing address, occupation and name of employer for contributors who exceed the \$200 threshold, the following procedures are performed:

Clear and Conspicuous Request

All solicitations include an accurate and clear statement of the law's requirements for the collection and reporting of the above contributor information.

Follow-Up Requests Within 30 Days

On a monthly basis, a report is generated that list all contributors who have contributed over \$200 at the completion of the month. This report is then reviewed and any contributors identified who did not provide the FEC required information are identified. A written follow-up request is then sent to the contributors who provided the incomplete information. All follow-up requests to contributors of more than \$200 include the following wording:

'To comply with Federal law, we must use best efforts to obtain, maintain, and submit the name, mailing address, occupation, name of employer of individuals whose contributions exceed \$200 per calendar year.'

Since we file on a quarterly basis (bi-annually in nonelection years), most of the information obtained from our follow-up requests process is reported with the regularly scheduled report as oppose to requiring an alternate reporting mechanism. For information obtained from follow-up requests that are received subsequent to the related reporting date, our procedures are established to report this information in a memo Schedule A with the next regularly scheduled report. We believe these procedures are in compliance with the 'best efforts' standard.

If you require any further information, please contact me at (202) 491-6368.

Sincerely,

C.E. Jones, Assistant Treasurer
Black America's PAC
